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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

SHEA HUGHES, an individual, and on
behalf of all others similarly situated,

Plaintiff,

v.

TVI, INC., a Washington Corporation;
and DOES 1-100, inclusive,

Defendants.

CASE NO.: 2:24-00250-WBS-AC

**STIPULATION AND ORDER TO
CONTINUE CLASS CERTIFICATION
DEADLINES**

Complaint Filed: November 28, 2023
Trial Date: May 19, 2026

1 Plaintiff Shea Hughes (“Plaintiff”) and Defendant TVI, INC. (“Defendant”), by and
2 through their counsel of record, hereby stipulate and agree as follows:

3 WHEREAS, on November 28, 2023, Plaintiff Shea Hughes filed a Class Action
4 Complaint against Defendant in the Superior Court of the State of California – County of
5 Solano, Case No. CU23-5586 (“Hughes Class Action”);

6 WHEREAS, at or around the time Plaintiff filed the Class Action Complaint in
7 Solano County, Plaintiff filed a separate Complaint against Defendant for penalties under
8 the Private Attorneys General Act in Solano County, Case No. CU23-05591 (“Hughes
9 PAGA Action”);

10 WHEREAS, Defendant removed the Hughes Class Action, and the Hughes PAGA
11 Action remains pending in Superior Court;

12 WHEREAS, Defendant filed a notice of related cases identifying the class action
13 case entitled *Jose Villanueva v. TVI, Inc., et al.*; Northern District of California Case No.
14 5:24-cv-01649 (“Villanueva Class Action”), as a related case;

15 WHEREAS, the Parties agreed to participate in a global mediation for the Hughes
16 Class Action, the Hughes PAGA Action, the Villanueva Class Action;

17 WHEREAS, the global mediation occurred on January 24, 2025, and resulted in a
18 mediator’s proposal to which the Parties must respond on or before January 31, 2025;

19 WHEREAS, the Court set a class certification filing deadline for the Hughes Class
20 Action for January 31, 2025 (Doc. 19); and

21 WHEREAS, to preserve the Parties and the Court’s resources, the Parties agree,
22 and respectfully request, to continue the class certification deadlines by six months.

23 IT IS HEREBY STIPULATED by and between Plaintiff and Defendant as follows:

- 24 1. Plaintiff’s deadline to file a motion for class certification shall be continued until
25 July 31, 2025.
26 2. Defendant’s opposition shall be due by September 5, 2025.
27 3. Plaintiff’s reply shall be due by September 26, 2025.
28

IT IS SO STIPULATED

Dated: January 28, 2025

JACKSON LEWIS P.C.

By: /s/ Adam Y. Siegel (as authorized 1/24/25)
Adam Y. Siegel

Attorneys for Defendant
TVI, INC

Dated: January 28, 2025

CROSNER LEGAL, P.C.

By: /s/ Chad Saunders
Chad Saunders

Attorneys for Plaintiff Shea Hughes

ORDER

Pursuant to the Parties' stipulation, the Court hereby Orders as follows:

1. Plaintiff's deadline to file a motion for class certification shall be continued until July 31, 2025.
2. Defendant's opposition shall be due by September 5, 2025.
3. Plaintiff's reply shall be due by September 26, 2025.

Dated: January 28, 2025



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE